

JAN 25 2017

CONSERVATION DIVISION  
WICHITA, KS

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Jay Scott Emler, Chairman  
Shari Feist Albreht  
Pat Apple

In the matter of the Notice of Denial of ) Docket NO: 17-CONS-3425-CMSC  
License Renewal Application to )  
Northstar Investments, Inc. ) CONSERVATION DIVISION  
)  
\_\_\_\_\_ ) License No.: 30601

**MOTION REQUESTING AN EXTENSION OF TIME**  
**FOR ADDITIONAL DISCOVERY**

Northstar Investments Inc., through its President and alter ego Dean Britting, presents the following in support of a motion for additional time.

1) Regarding the Jacobs 1-A well, as a favor to Ventures in Petroleum H-30 allowed them to initially use H-30's license for the Intent to Drill with the understanding Ventures would acquire their own License and transfer well accordingly. Until recently, I personally had no knowledge nor was I part of this arrangement.

2) Following is a list of what will be helpful in establishing who is responsible for plugging this well assuming it hasn't already been plugged.

- a) Contact surface owner.
- b) Locate well.
- c) If possible determine well status.
- d) Determine chain of title for working interest.
- e) Attempt to locate working interest owners to determine what they know about the well's history.
- f) Determine the history of H-30's and Ventures in Petroleum's ownership.

## SUMMARY

I have presented a list of actions that are essential to resolving any questions establishing responsible parties. I feel confident that as these actions are carried out more questions will surface and will take more time to investigate. Accordingly, I am asking for the maximum amount of time as possible.

Respectfully submitted,

Northstar Investments, Inc.

  
by: Dean Britting, President

## CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2017, I caused an original and 7 true and correct copies of the foregoing Motion to be served in person to Jon Myers per his verbal instructions at the Corporation Commission's Wichita offices..